

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

MATTHEW P. MOCCIA
ASSOCIATE
TEL: (212) 238-4863
EMAIL: mmoccia@lcbf.com

120 BROADWAY
13TH FLOOR
NEW YORK, NEW YORK 10271
TELEPHONE (212) 238-4800
FACSIMILE (212) 238-4848
www.lcbf.com

One Gateway Center
22nd Floor
Newark, NJ 07102
Tel: (973) 623-2700

One Penn Center
1617 JFK Boulevard, Suite
955
Philadelphia, PA 19103
Tel: (215) 561-8540

300 Delaware Avenue
Suite 210
Wilmington, DE 19801
Tel: (302) 514-6901

September 7, 2023

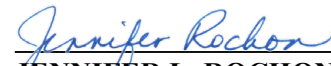
Via ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

The request is GRANTED. The post-discovery conference shall take place on **March 19, 2024** at 10:00 a.m. in Courtroom 20B.

SO ORDERED.

Dated: September 7, 2023
New York, New York


JENNIFER L. ROCHON
United States District Judge

Re: *Martin Ruziecki v. National Passenger Railroad Corporation (AMTRAK)*
Index No.: 22-cv-10953 (JLR) (RWL)

Dear Judge Rochon:

We represent Defendant National Railroad Passenger Corporation (“Amtrak”) in the above-referenced matter. We write jointly with Plaintiff to request a ninety (90) day adjournment of the upcoming status conference, currently scheduled for September 12, 2023.

On August 15, 2023, the parties jointly requested a sixty (60) day extension of discovery deadlines. Upon granting the request, Judge Lehrburger advised that should the parties wish to adjourn the status conference, they should direct their request to Your Honor. The parties respectfully submit that a status conference would be more productive at a later date, after further discovery, including depositions, has been conducted. At this time, the deadline for depositions is December 11, 2023 and the deadline for fact discovery is February 6, 2024.

As reported in the parties’ August 15, 2023 letter, the parties have exchanged Rule 26 Disclosures and written discovery demands, which include Interrogatories, Requests for Documents, and Request for Admissions. Amtrak has produced responses to Plaintiff’s Request for Admissions, and the parties are in the process of preparing the remaining responses.

This is the first request for an adjournment of a status conference in this matter, although, as stated above, the parties have previously requested an extension of discovery deadlines.

Thank you for your consideration of this request.

LANDMAN CORSI BALLAINE & FORD P.C.

Hon. Jennifer L. Rochon
September 7, 2023
Page 2

Respectfully submitted,

/s/ Matthew P. Moccia
Matthew P. Moccia

cc: James M. Duckworth
Keller Goggin PC
Attorneys for Plaintiff
1420 Walnut Street
Suite 1108
Philadelphia, PA 19102
(215) 735-8780